

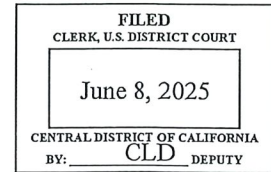
AO 91 (Rev. 11/11) Criminal Complaint (Rev. by USAO on 3/12/20)

☐ Original ☐ Duplicate Original

UNITED STATES DISTRICT COURT

for the

Central District of California



United States of America,

v.

BRAYAN RAMOS-BRITO et al.,

Defendants.

Case No. 2:25-mj-03506-DUTY-3

**CRIMINAL COMPLAINT BY TELEPHONE
OR OTHER RELIABLE ELECTRONIC MEANS**

I, Adam N. Gallegos, the complainant in this case, state that the following is true to the best of my knowledge and belief. On or about the date of June 7, 2025, in the county of Los Angeles in the Central District of California, the defendants violated:

Code Section

18 U.S.C. § 111

Offense Description

Assault on a Federal Officer

This criminal complaint is based on these facts:

Please see attached affidavit.☒ Continued on the attached sheet.

/s/

Complainant's signature

Adam N. Gallegos, Special Agent

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone.

Date:

June 8, 2025 at 1:29 p.m.

Judge's signature

City and state: Los Angeles, California

Hon. Jacqueline Chooljian, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT

I, Adam N. Gallegos, being duly sworn, declare and state as follows:

I. PURPOSE OF AFFIDAVIT

1. This affidavit is made in support of a criminal complaint and arrest warrants for the following individuals for violating Title 18, United States Code, Section 111 (Assault on a Federal Officer):

- a. Brayan RAMOS-BRITO ("RAMOS-BRITO");
- b. Jose Manuel MOJICA ("MOJICA");
- c. Ashley RODRIGUEZ ("A. RODRIGUEZ"); and
- d. Joceline RODRIGUEZ ("J. RODRIGUEZ").

2. The facts set forth in this affidavit are based upon my personal observations, my training and experience, and information obtained from various law enforcement personnel and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not purport to set forth all of my knowledge of or investigation into this matter. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and in part only and all dates and times are on or about those indicated.

II. BACKGROUND OF SPECIAL AGENT ADAM N. GALLEGOS

3. I am a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations ("HSI"), and have been since February 2020. I am currently assigned to the Orange County, California Field Office.

4. As part of my daily duties as an HSI Special Agent, my responsibilities include the investigation of criminal violations, to include violations related to assault on federal officers. I have also received training and have conducted and/or assisted in investigations involving the violation of laws pertaining to drug trafficking, bulk cash smuggling, money laundering, gangs, human trafficking, and child exploitation. I am a graduate of the Criminal Investigator Training Program and the HSI Special Agent Basic Training Program at the Federal Law Enforcement Training Center in Glynco, Georgia. Prior to my career as an HSI Special Agent, I was employed by the Bureau of Alcohol, Tobacco, Firearms and Explosives ("ATF") as an Intelligence Research Specialist. I was employed with the ATF since October of 2016.

III. STATEMENT OF PROBABLE CAUSE

5. Based on my review of law enforcement reports, conversations with other law enforcement agents, and my own knowledge of the investigation, I am aware of the following:

A. Protest at HSI Office in Paramount, California

6. At approximately 10:00 a.m., on Saturday, June 7, 2025, a group of individuals began to gather in front of the office complex located at 6321 Alondra Boulevard in Paramount, California. That complex houses an HSI office, and the group of individuals appeared to be gathering to protest federal immigration enforcement operations that took place on June 6, 2025. The size of the group grew steadily, and eventually individuals in the group turned violent and began trying to gain

Blocked vehicle
ignored commands
resisted arrest
shoved agent on video

entry into the secured office complex. As a result, agents from the United States Border Patrol ("USBP") were mobilized to respond to the scene and prevent the violent agitators from entering the office complex.

B. Attack on Federal Agents and Arrest of Agitators

7. According to three USBP agents who responded to the scene, USBP agents were attempting to drive USBP cars into the office complex through the large group that was gathered outside. As they did so, two females (later identified as A. RODRIGUEZ and J. RODRIGUEZ) stood in front of the lead USBP car in an apparent attempt to prevent the USBP cars from entering the office complex.

8. USBP agents told both A. RODRIGUEZ and J. RODRIGUEZ to stop blocking the cars, but both women ignored those commands. As a result, USBP agents exited their cars to physically move both women from the path of the USBP cars. When a USBP agent attempted to move A. RODRIGUEZ, she resisted and broke free. Once she was free, she turned and shoved the agent with both of her hands. Then, as a group of USBP agents moved toward A. RODRIGUEZ to place her under arrest, J. RODRIGUEZ grabbed the arm of one of those USBP agents in an apparent effort to prevent the USBP agent from arresting A. RODRIGUEZ. Ultimately, both A. RODRIGUEZ and J. RODRIGUEZ were placed under arrest, loaded into USBP cars, and detained inside the HSI office inside the office complex.

9. Later, I was able to view a video posted to social media showing A. RODRIGUEZ physically shoving a USBP agent.

Another video posted to social media showed USBP arresting A. RODRIGUEZ, and J. RODRIGUEZ grabbing a USBP agent's arm as he was attempting to arrest A. RODRIGUEZ.

10. In the wake of the arrests of A. RODRIGUEZ and J. RODRIGUEZ, an unidentified male ("UM") approached a USBP agent who was positioned outside the office complex and punched the agent in the face. The UM ran away and was pursued by USBP agents. As the agents pursued the UM, RAMOS-BRITO stepped into the agents' path and used his body to block the agents' pursuit. Then, RAMOS-BRITO approached one of the pursuing agents and told the agent, in substance and summary, "I'll fuck you up I don't care who you are." When the USBP agent tried to physically move RAMOS-BRITO to continue the pursuit, RAMOS-BRITO pushed the USBP agent in the chest.

11. After RAMOS-BRITO pushed the USBP agent in the chest, a group of USBP agents moved to arrest him. As they did so, MOJICA physically made an attempt to thwart RAMOS-BRITO's arrest. MOJICA used his body to physically shield RAMOS-BRITO, and when USBP agents attempted to get near RAMOS-BRITO, MOJICA elbowed and pushed USBP agents to get them away from RAMOS-BRITO. Ultimately, agents subdued both RAMOS-BRITO and MOJICA and placed them under arrest.

C. Post-Arrest Mirandized Statements


12. Following their arrests, agents read A. RODRIGUEZ, J. RODRIGUEZ, RAMOS-BRITO, and MOJICA their Miranda rights. The four individuals waived their Miranda rights and spoke with HSI agents. In substance and summary, all four individuals denied

that they assaulted any federal officers despite the fact that at least two of them were caught on video assaulting officers.

IV. CONCLUSION

13. For all the reasons described above, there is probable cause to believe that RAMOS-BRITO, MOJICA, A. RODRIGUEZ, and J. RODRIGUEZ committed a violation of Title 18, United States Code, Section 111 (Assault on a Federal Officer).

Attested to by the applicant in
accordance with the requirements
of Fed. R. Crim. P. 4.1 by
telephone on this 8th day of
June 2025 at 1:29 p.m.


HON. JACQUELINE CHOOLJIAN
UNITED STATES MAGISTRATE JUDGE